

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THOMAS R. AHERN,

Plaintiff,

vs.

SIG SAUER, INC., AND CITY OF
CAMBRIDGE

Defendants.

Civil Action No.: 21-cv-11007-DJC

UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to L.R. 7.2, counsel for Plaintiff Thomas Ahern (“Mr. Ahern”) hereby submits this motion for leave to file portions of Plaintiff’s forthcoming Motion for Sanctions, and certain exhibits attached thereto, under seal.

In furtherance hereof, Mr. Ahern states as follows:

1. Counsel for Mr. Ahern intends to file a Motion for Sanctions (the “Motion”) against defendant SIG Sauer, Inc. (“Sig”).
2. In his Motion, Mr. Ahern intends to include detailed descriptions of a document recently produced by Sig to Mr. Ahern entitled the Failure Modes Effects and Criticality Analysis (“the FMECA”), which Sig has marked “Highly Confidential” and subject to this Court’s July 11, 2022 Protective Order. ECF 54. Mr. Ahern also intends to attach the FMECA in its entirety, as well as excerpts from deposition transcripts that have been marked “Confidential,” as exhibits to the Motion.
3. Pursuant to the Protective Order in this case, a party seeking to file material designated confidential must seek to do so under seal, consistent with Local Rule 7.2 for the U.S.

District Court for the District of Massachusetts. Pursuant to L.R. 7.2 and Mr. Ahern's obligations under the Order, he so moves. ECF 54 ¶ 7.

4. SIG has marked the FMECA as "Highly Confidential." The deposition transcripts, excerpts of which have been attached to the Motion for Sanctions, also have been marked as "Confidential." Accordingly, good cause exists for Mr. Ahern to file portions of his Motion describing the FMECA and other confidential materials, and certain exhibits attached thereto, under seal.

5. Sig does not oppose the relief sought herein.

Accordingly, Mr. Ahern hereby requests that the Court allow him to file portions of his Motion for Sanctions, and certain exhibits attached thereto, under seal.

Respectfully submitted,

Date: June 24, 2025

/s/ Peter K. Levitt

Peter K. Levitt (BBO #565761)
Michelle R. Pascucci (BBO #690889)
Pietro A. Conte (BBO #707055)
DONNELLY, CONROY & GELHAAR LLP
260 Franklin Street, Suite 1600
Boston, MA 02110
Tel: 617-720-2880
pkl@dcglaw.com
mrp@dcglaw.com
pac@dcglaw.com

/s/ Jeffrey S. Bagnell

Jeffrey S. Bagnell
Federal Bar No. CT18983
Admitted Pro Hac Vice
Jeffrey S. Bagnell, Esq., LLC
55 Post Road West
Westport, Connecticut 06880
Tel: 203-984-8820
jeff@bagnell-law.com

L.R. 7.1(a)(2) CERTIFICATION

Pursuant to L.R 7.1(a)(2), I certify that I have conferred with counsel for Defendant Sig Sauer, Inc. and attempted in good faith to resolve or narrow the issues contained herein. Sig Sauer, Inc. does not object to the relief sought herein.

/s/ Michelle R. Pascucci
Michelle R. Pascucci

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), on June 24, 2025.

/s/ Pietro A. Conte
Pietro A. Conte